

UNITED STATES OF AMERICA)
)
VS.)
) CRIMINAL NO. 05-30050- MAP
MIGUEL LOZADA,)
Defendant)

DEFENDANT'S MOTION TO BE BROUGHT TO COURT TO ATTEND ALL HEARINGS
REGARDING INDICTMENT NO. 05-30050-MAP

Now comes the Defendant, Miguel Lozada, and does hereby respectfully request that this Honorable Court order that the Defendant be brought into this Honorable Court by the appropriate officials from the Hampden County House of Corrections for purposes of attending all further hearings in the above referenced matter.

As grounds for this motion the Defendant does submit that he feels strongly that his presence at each of the proceedings in the above referenced matter is necessary to ensure that he has an opportunity to defend against the charges brought against him by the Government. According to **U.S.C.A. Const. Amend. 14**, the Defendant is guaranteed right to be present at any stage of criminal proceeding that is critical to its outcome if his presence would contribute to fairness procedure. It is furthermore the Defendant's position that he has a due process right to be present in his own person whenever his presence has relation, reasonably substantial, to fullness of his opportunity to defend against charge. **U.S.C.A Const. Amend. 14**. The Defendant feels strongly that at this stage in the proceedings against him, it is essential that he be present.

Respectfully Submitted
The Defendant
By his Attorney,

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